

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

**IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION**

MDL No. 3047

Case No.: 4:22-md-03047-YGR-PHK

THIS DOCUMENT RELATES TO:

**DECLARATION OF FRANCES HAUGEN
IN SUPPORT OF JOINT LETTER BRIEF**

ALL MATTERS

**Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang**

1
2 I, Frances Haugen, declare as follows:

3 1. I am over the age of 18 and have personal knowledge of the following facts. I
4 could competently testify to these facts if called upon to do so.

5 2. I was an employee of Facebook, Inc. (now known as Meta) from June 2019 to
6 May 2021. I blew the whistle on Facebook in 2021 due to grave concerns during my time at
7 Facebook over choices made by the company to prioritize profits over safety.

8 3. Today, I dedicate my time to serving as an advocate for accountability &
9 transparency in social media. This includes working as founder and Chief Executive Officer of
10 Beyond the Screen, a nonprofit dedicated to building an ecosystem of accountability for the
11 social media industry.

12 4. I provide this Declaration to provide additional information concerning the burden
13 in responding to the subpoena for documents served on me by Meta on March 4, 2025 (the
14 "Subpoena").

15 5. My counsel provided me with 109 search terms for me to run preliminary
16 searches in order to help assess the burden in responding to the Subpoena.

17 6. Running each of these search terms across my two primary email addresses took
18 about 10-15 hours.

19 7. These searches yielded a total of 14,387 documents.

20 I declare under penalty of perjury under the laws of the United States of America, pursuant to 28
21 U.S.C. § 1746, that the foregoing is true and correct to the best of my knowledge.

22 Executed this 17th day of June, 2025, in Carolina, Puerto Rico.

23
24 

Frances Haugen